

LOCAL BANKRUPTCY FORM 9013-3

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:

PHILIP A. BROWN and, NANCY LEE BROWN	:	CHAPTER <u>13</u>
	:	CASE NO. <u>1-19-bk-05295-HWV</u>
	:	
	:	
Debtor(s)	:	
TOYOTA MOTOR CREDIT CORPORATION,	:	ADVERSARY NO. <u>ap-</u>
	:	(if applicable)
	:	
	:	
Plaintiff(s)/Movant(s)	:	
vs.	:	Nature of Proceeding: <u>Hearing re:</u>
PHILIP A. BROWN, NANCY LEE BROWN, MARLEE BROWN, and JACK N. ZAHAROPOULOS, Trustee	:	<u>Motion for Relief from Automatic Stay</u>
	:	
	:	
Defendant(s)/Respondent(s)	:	Document #: <u>54, 55</u>

REQUEST TO CONTINUE HEARING/TRIAL WITH CONCURRENCE¹

This request must be filed at least twenty-four (24) hours prior to the hearing. All requests must be approved by the Court. Submitting a request is not an automatic continuance.

The undersigned hereby requests a continuance with the concurrence of the opposing party (parties). This is a first request for a continuance.²

Reason for the continuance.

Parties are currently in the process of resolving the Motion for Relief from Stay filed by Toyota Motor Credit Corporation and agree to request a continuance from this Honorable Court of the hearing currently scheduled for Tuesday, February 1, 2022

Contemporaneous with the filing of this request, the undersigned has served a copy of this request upon all counsel participating in this proceeding.

Dated: January 31, 2022

/s/ Keri P. Ebeck

Attorney for Toyota Motor Credit Corporation

Name: Keri P. Ebeck, Esq.

Phone Number: (412) 456-8112

¹ No alterations or interlineations of this document are permitted.